

EXHIBIT 10

Tram Nguyen

From: Mark Silver <MSilver@coughlinduffy.com>
Sent: Wednesday, June 20, 2018 5:10 PM
To: Leigh O'Dell; Chris Tisi
Cc: Michelle Parfitt; Richard D. Meadow; Chris Placitella
Subject: RE: MDL - Imerys "Lanzo Box" Inventory
Attachments: 2018.06.20 - Talc Sample Inventory - Crouse J&J Samples.xlsx

Leigh,

I write in response to your June 18, 2018 email regarding outstanding issues.

- 1) Samples - As a follow up to my May 30 letter and our additional discussions/communications, I have been able to confirm that the samples identified in my May 30 letter as "Samples Identified in Asbestos Litigation" are of the same grade as the talc shipped to J&J. The inventory of those samples was provided with my May 30 letter. Additionally, attached hereto is an inventory of samples that were in the possession of former Imerys employee David Crouse. The samples identified are from the China mines and are of the same grade as the talc shipped to J&J. Therefore, in sum, you are now in possession of the following supplemental inventories: 1) Samples for 2012-2014; 2) The "Lanzo Box"; 3) "Samples Identified in the Asbestos Litigation" also colloquially referred to "The Vermont Boxes"; and 4) Samples that were in possession of David Crouse. As of this writing, Imerys does not anticipate any additional sample disclosures. Please let me know which samples, if any, you would like to split pursuant to the MDL protocol so that we can begin coordinating same with Alliance Labs.
- 2) Core logs – Your email inquired about the production of core logs from the China and Italy mines. Imerys' document production does not contain core logs from those mines because Imerys Talc America does not possess core logs from those mines. Those mines are owned by other entities.
- 3) Core Samples - Your email inquired about the production/inspection of core samples from the Vermont, China and Italy mines. With respect to the China and Italy mines, Imerys is not in possession of core samples from the China or Italy mines as Imerys Talc America does not own either mine. With respect to the Vermont mine, Imerys objects to inspection and testing as the request is duplicative. Core samples are exploratory in nature and are not the best reflection of samples of talc mined and sent to J&J. Samples of talc shipped to J&J have been provided.
- 4) TEM Grids - As you know, the parties disagree as to whether the PSC's prior request actually included TEM grids. It is Imerys' position that this is a new request first raised in approximately March 2018. Nonetheless, working under the premise that a request is now pending, Imerys needs more information about the proposed inspection/testing that the PSC wishes to perform. It is my understanding that the TEM grids are extremely fragile and brittle and have the potential to be destroyed simply by removing them from their storage boxes. In addition, it is also my understanding that it is more likely than not that any additional testing of the grids will result in a partial, if not complete, destruction of the grids. Given the fact that the TEM grids are comprised of samples already provided to the PSC and that the results and photos, to the extent they exist, related to the initial testing were produced by Imerys, Imerys does not believe that testing that would almost assuredly be destructive in nature is necessary or appropriate. Moreover, as I previously advised on one of our recent meet and confer calls, even if Imerys agreed to allow observation and/or testing to go forward, it would only do so pursuant to a protocol that covered both the MDL litigation and the asbestos litigation (similar to the sample protocol). Therefore, If the PSC provides Imerys with a proposal identifying specifically what it wants to do with the TEM grids, Imerys will take it under advisement, and get back to you.

Finally, as I raised in my last e-mail, we need to have a meet and confer on the MDL samples being requested by the Simon Greenstone firm. I am happy to discuss that issue separately from the issues above if you prefer, but I would like to schedule a call to discuss that particular issue for the end of this week or the beginning of next.

Let me know your availability.

Thanks,
Mark



Mark K. Silver | Partner

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From: Leigh O'Dell [mailto:Leigh.ODell@BeasleyAllen.com]

Sent: Tuesday, June 19, 2018 6:22 PM

To: Mark Silver <MSilver@coughlinduffy.com>; Chris Tisi <ctisi@levinlaw.com>

Cc: Michelle Parfitt <mparfitt@ashcraftlaw.com>; Richard D. Meadow <Richard.Meadow@LanierLawFirm.com>; Chris Placitella <cplacitella@cpirlaw.com>

Subject: RE: MDL - Imerys "Lanzo Box" Inventory

Mark,

As always, we are happy to confer with you but, to be productive, we need to understand the results of your investigation into whether the samples described in your May 30 letter were taken from mines that sourced J&J talc. We also need information (including a full inventory) about the former-employee box you discovered now more than two weeks ago.

We are not in a position to select and split samples without this information. As we explained previously, we need the information to ensure that we make informed selections. In addition, the costs and time associated with splitting samples are quite significant. Last time the cost of splitting of Imerys samples exceeded \$18,000. That is another reason need to know the universe before we proceed.

Also, do you have information suggesting that there may be additional samples that may be relevant to this case?

When do you anticipate getting this information to us so we can have a productive call?

Thanks,
Leigh

P. Leigh O'Dell

Principal

From: Mark Silver <MSilver@coughlinduffy.com>

Sent: Tuesday, June 19, 2018 9:56 AM

To: Leigh O'Dell <Leigh.ODell@BeasleyAllen.com>; Chris Tisi <ctisi@levinlaw.com>

Cc: Michelle Parfitt <mparfitt@ashcraftlaw.com>; Richard D. Meadow <Richard.Meadow@LanierLawFirm.com>; Chris Placitella <cplacitella@cprlaw.com>

Subject: RE: MDL - Imerys "Lanzo Box" Inventory

Leigh,

Let's do a call on Thursday afternoon. We can discuss all of the below. I am free anytime between 1 pm and 5 pm. Eastern.

[REDACTED]

[REDACTED]

Let me know if you are available to talk Thursday afternoon.

Mark



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sam

From: Leigh O'Dell [<mailto:Leigh.ODell@BeasleyAllen.com>]

Sent: Monday, June 18, 2018 3:02 PM

To: Mark Silver <MSilver@coughlinduffy.com>; Chris Tisi <ctisi@levinlaw.com>

Cc: Michelle Parfitt <mparfitt@ashcraftlaw.com>; Richard D. Meadow <Richard.Meadow@LanierLawFirm.com>; Chris

Placitella <cplacitella@cprlaw.com>

Subject: RE: MDL - Imerys "Lanzo Box" Inventory

Dear Mark:

Thank you for the update.

In your May 30th letter, you indicate that you are investigating whether the samples being identified in the asbestos litigation are samples of talc sent to Johnson & Johnson (JJ/JJCI). Please advise us as to the status of your investigation and when we might have further information. In addition to other pertinent information, we would like to know whether the samples were taken from talc ore mined from deposits used to supply talc to JJ/JJCI talc for Baby Powder and Shower to Shower. This information is critical to the decision-making process for selecting and testing samples. With nearly three weeks now having elapsed since your letter and in light of the Court's admonition to complete testing as soon as possible, we will need to raise the issue with Judge Pisano if you are not able to provide this information to us by mid-week.

Also, I wanted to follow-up on three other outstanding issues: 1) TEM grids; 2) drill cores; and 3) core logs from Italy and China. First, as we have previously discussed, the TEM grids to which Julie Pier testified are relevant for testing purposes – not only to analyze the results of testing performed by Imerys or a third-party lab, but also so the grids can be examined by our experts. Please let us know Imerys's position on making those available to the PSC.

Secondly, drill cores are a source of data that is customarily relied on by geologists. We believe, therefore, that inspection of drill cores taken from Imerys mines in Italy, Vermont, and China by our expert geologists is appropriate. Please advise us of Imerys's final position on making the cores available for inspection and/or testing.

Third, upon our request, Lorna provided bates number related to core logs in Imerys's production. The core logs Lorna identified were from drilling done in Vermont. We have diligently searched the entire production for core logs from Imerys's mines in China and Italy. We have been unable to locate them and believe that these drill core logs have not been produced. Please advise if the core logs from China and Italy have been produced and if not, when they will be produced.

Thank you for your attention to these issues. In light of the upcoming 30(b)(6) depositions and the fact that these issues have been the topic of ongoing discussions, we would ask that you address them as soon as possible.

Best regards,
Leigh

P. Leigh O'Dell

Principal

From: Mark Silver <MSilver@coughlinduffy.com>

Sent: Friday, June 15, 2018 4:08 PM

To: Leigh O'Dell <Leigh.ODell@BeasleyAllen.com>; Chris Tisi <ctisi@levinlaw.com>

Cc: Michelle Parfitt <mparfitt@ashcraftlaw.com>; Richard D. Meadow <Richard.Meadow@LanierLawFirm.com>; Chris

Placitella <cplacitella@cprlaw.com>

Subject: RE: MDL - Imerys "Lanzo Box" Inventory

Leigh/Chris,

Updating you on this issue.....I checked in with my national team and I anticipate having the additional inventory to you early next week.

Have a good weekend !

Mark



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From: Leigh O'Dell [<mailto:Leigh.ODell@BeasleyAllen.com>]

Sent: Wednesday, June 13, 2018 10:54 AM

To: Mark Silver <MSilver@coughlinduffy.com>; Chris Tisi <ctisi@levinlaw.com>

Cc: Michelle Parfitt <mparfitt@ashcraftlaw.com>; Richard D. Meadow <Richard.Meadow@LanierLawFirm.com>; Chris Placitella <cplacitella@cprlaw.com>

Subject: RE: MDL - Imerys "Lanzo Box" Inventory

Mark, as of today, an additional 203 samples have been disclosed, nearly all from years for which no samples were previously made available. The number of Imerys samples has nearly doubled. We are digesting this information as quickly as possible, but in order to make an informed decision about which samples to split, we need to know the universe we are dealing with. What is your best estimate of when additional information will be provided to us? Thanks.

Leigh

P. Leigh O'Dell

Principal

From: Mark Silver <MSilver@coughlinduffy.com>

Sent: Wednesday, June 13, 2018 8:45 AM

To: Chris Tisi <ctisi@levinlaw.com>

Cc: Leigh O'Dell <Leigh.ODell@BeasleyAllen.com>; Michelle Parfitt <mparfitt@ashcraftlaw.com>

Subject: RE: MDL - Imerys "Lanzo Box" Inventory

Chris,

There is only one inventory outstanding. We are still working on it and trying to confirm whether those samples are samples relevant to the MDL. We are working as fast as we can. In the interim, since the PSC knows that it wants splits of other samples, I suggest you identify which samples you want of the inventories already provided, so we can get the splits set up as soon as possible.

Mark



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From: Chris Tisi [<mailto:ctisi@levinlaw.com>]

Sent: Friday, June 8, 2018 7:48 PM

To: Mark Silver <MSilver@coughlinduffy.com>

Cc: Leigh O'Dell (Leigh.ODell@BeasleyAllen.com) <Leigh.ODell@BeasleyAllen.com>; Michelle Parfitt <mparfitt@ashcraftlaw.com>

Subject: Re: MDL - Imerys "Lanzo Box" Inventory

Thanks Mark.

Couple questions:

When do you think you will have the inventory complete for the samples with your former employee that you mentioned yesterday? We will want to figure that into our thinking of testing going forward

Also, it was our understanding that you were going to supplement some of the information in the "asbestos litigation" boxes. Assuming I am correct, can you let us know when you think that'll be complete as those too would figure into our thinking

Let us know whether you think we should discuss these again next week.

Have a good weekend
Chris

Sent from my iPhone

On Jun 8, 2018, at 12:33 PM, Mark Silver <MSilver@coughlinduffy.com> wrote:

Chris/Leigh/Michelle,

Following up on yesterday's meet and confer, attached is the "Lanzo Box" Inventory. I am ready to set up splits of these and other samples as soon you identify which ones you want.

Mark

<image001.jpg>

Mark K. Silver | Partner

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<Lanzo Box Inventory.pdf>

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PHOTO ID#	Date	Project Number	Description	Sample Number	Sample Description	Information on Samples	Additional Package or Comments
SJ060718 - 007	01/00/2003		Guangxi 2			RM MV Tian Song Feng	
SJ060718 - 046	09/00/2004		Guangxi 2			RM MV Danae	
SJ060718 - 054	1/18/2005		Guangxi 2			RM MV Tai Chang	
SJ060718 - 061	09/00/2005		Guangxi 2			RM MV Pacific Acadian	
SJ060718 - 066	09/00/2005		Guangxi 2A			RM MV Pacific Acadian	
SJ060718 - 068	3/6/2006		Guangxi 2A			RM Pos Eternity	
SJ060718 - 073	6/8/2006		Guangxi 2			RM Hebei Arrow	
SJ060718 - 075	6/8/2006		Guangxi 2A			RM Hebei Arrow	
SJ060718 - 085	10/12/2007		Guangxi 2			RM MV Wing	
SJ060718 - 089	11/23/2007		Guangxi 2			RM MV Helenic Sea	
SJ060718 - 092	11/23/2007		Guangxi 2			RM MV Helenic Sea	
SJ060718 - 098	1/9/2009		Guangxi 2			RM MV Anna Smile	
SJ060718 - 101	9/20/2010		Guangxi 2			RM MV Sonja C	